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Filed : July 2, 2003

REMARKS

By the foregoing amendments, Applicants have amended Claim 1, and have added three new dependent claims. No new matter has been added.

I. Objection to Claim 1

Applicants have amended Claim 1 to correct the error identified by the Examiner.

II. Anticipation Rejection of Claims 1-45

In the Office Action, the Examiner rejected Claims 1-45 under section 102(e) as being anticipated under section 102(e) by U.S. Patent Pub. 2002/0143925 to Pricer et al. (hereinafter "Pricer"). Applicants respectfully submit that the anticipation rejection is improper because Pricer does not teach all of the limitations of any independent claim of the present application. Each independent claim is discussed below.

Independent Claim 1

With respect to Claim 1, as amended herein, Pricer does not teach "an event history server that persistently stores event data descriptive of events that occur during browsing sessions of each of a plurality of users of the web server system, wherein the event history server stores the event data substantially as corresponding events occur, and makes such event data available in real time to the one or more applications to facilitate personalization of web pages for the users," in the context of the other limitations of Claim 1.

As discussed during the interview, Pricer discloses an architecture in which browsing events are initially recorded in a web log. This web log data is subsequently parsed and analyzed to extract and organize the data for storage in Pricer's database management system (DBMS). See paragraphs 0009 and 0012-0016 of Pricer. Thus, Pricer's DBMS does not store the event data "substantially as corresponding events occur," and does not make such event data available "in real time," as required by Claim 1.

In addition, Pricer does not teach the use of the DBMS to provide event data to "one or more applications that generate personalized content for recognized users based on browse histories of such users."

Because Pricer does not teach all of the limitations of Claim 1, the anticipation rejection of Claim 1 and its dependent claims (nos. 2-13) is improper and should be withdrawn.

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Independent Claim 14

With respect to independent Claim 14, Pricer does not teach “a plurality of storage layer servers that persistently store, and provide real-time access to, event data descriptive of browsing events that occur during web browsing sessions of users.” As discussed above, Pricer’s DBMS does not provide real-time access to the event data it stores, as the event data is not stored in the DBMS as the corresponding events occur.

Pricer also fails to teach that the storage layer servers “are implemented as mirrors of each other such that client requests for persistently stored event data can be serviced by any one of the storage layer servers.” In this regard, Pricer’s disclosure that rows of certain tables are “stored across multiple data-storage facilities 210_{1...N} to ensure that the system workload is distributed evenly across processing modules” (at paragraph 0011) appears to indicate that different storage facilities store different data, and not that this data is mirrored across servers.

Pricer also fails to teach “a plurality of cache layer servers that serve as intermediaries between the storage layer servers and clients of the event history server, wherein each cache layer server stores cached event data within a respective cache and uses the cached event data to respond to queries from the clients.”

Because Pricer does not disclose all of the limitations of Claim 14, the anticipation rejection of Claim 14 and its dependent claims (nos. 15-23) is improper and should be withdrawn.

Independent Claim 24

With respect to independent Claim 24, Pricer does not teach the following limitations in the context of the other limitations of the claim: “for at least one of the URLs, querying a server to determine whether event data stored for said user indicates that the user previously accessed the URL; and if the event data indicates that the user previously accessed the URL, including within a search results page an annotation indicating to the user that the URL was previously accessed.” It is not clear from the Office Action how the Examiner is construing this claim language to cover the disclosure of Pricer.

Because Pricer does not disclose all of the limitations of Claim 24, the rejection of Claim 24 and its dependent claims (nos. 25-29) is improper and should be withdrawn.

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Independent Claim 30

With respect to independent Claim 30, Pricer does not teach “a server that records user-specific data indicative of the search result URLs selected by users during browsing of the search result pages” in combination with a search application that “accesses the server to determine whether specific search result URLs have previously been accessed by a user who is conducting a search, and incorporates into the search results pages indications of which search result URLs were previously accessed, whereby users are notified of search result URLs they have previously accessed.” It is not clear from the Office Action how the Examiner is reading these limitations on the disclosure of Pricer.

Because Pricer does not disclose all of the limitations of Claim 30, the anticipation rejection of Claim 30 and its dependent claims (nos. 31-35) is improper and should be withdrawn.

Independent Claim 36

With respect to independent Claim 36, Pricer does not teach “generating a user-specific Bloom filter that reflects a plurality of the search result URLs selected by the user as indicated within said event history data,” and “in response to an occurrence of a given URL within a result of a search query submitted by the user, determining whether the user previously accessed the given URL at least in part by analyzing the user-specific Bloom filter.” As discussed during the interview, Pricer does not disclose the use of Bloom filters for the purpose set forth in the claim or for any other purpose.

Pricer also fails to teach the following limitations of Claim 36: “when the user is determined to have previously accessed the given URL, personalizing a search results page for the user with an indication that the user previously accessed the given URL.”

Because Pricer does not teach all of the limitations of Claim 36, the anticipation rejection of Claim 36 and its dependent claims (nos. 37-41) is improper and should be withdrawn.

Independent Claim 42

With respect to independent Claim 42, Pricer does not teach the following limitations: “generating a user-specific Bloom filter that represents a plurality of events included within the user’s browse history; determining whether a particular event exists within the browse history of the user at least in-part by analyzing said Bloom filter; and personalizing a web page for the user

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such that the web page reflects whether the particular event exists within the browse history of the user.” Because Pricer does not teach these limitations, the anticipation rejection of Claim 42 and its dependent claims (nos. 43-45) is improper and should be withdrawn.

Dependent Claims

The dependent claims recite additional limitations that are not taught by Pricer. For example, as discussed during the interview, Pricer does not disclose the following dependent claim limitations:

- In Claim 3: “wherein the event history server includes ... at least one cache layer server that caches event data of online users.”
- In Claim 4: “wherein the cache layer server [of Claim 3] is configured to collect event data of an unrecognized user during a browsing session, and to pass such collected event data to the at least one storage layer server for persistent storage thereof if the unrecognized user becomes recognized during the browsing session.”
- In Claim 5: “wherein the event history server comprises a plurality of cache layer servers, each of which is assigned to a different respective set of browse session IDs such that a given user remains assigned to a particular cache layer server throughout a browse session.”
- In Claim 7: “wherein the query interface of the event history server supports queries of the form ‘has User X accessed URL Y?’”
- In Claim 8: “wherein the query interface of the event history server supports queries of the form ‘when has User X accessed URL Y?’”
- In Claim 11: “wherein the at least one application includes a web search application that provides functionality for searching an index of web pages, and uses the event history server to identify and highlight web search result items that have previously been accessed by a user conducting a current search.”
- In Claim 12: “wherein the at least one application includes an application that provides functionality for users to interactively view and organize their respective browse history data as recorded by the event history server.”

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III. Conclusion

By focusing on specific claims and claim limitations in the discussion above, Applicants do not intend to imply that other claim limitations are taught by Pricer.

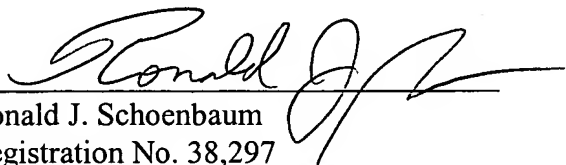
In view of the foregoing amendments and remarks, Applicants request that the Examiner withdraw the anticipation rejection and allow Claims 1-48.

If any issues remain which can potentially be resolved by telephone, the Examiner is invited to call the undersigned attorney of record at his direct dial number of 949-721-2950.

Respectfully submitted,

KNOBBE, MARTENS, OLSON & BEAR, LLP

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By: 
Ronald J. Schoenbaum
Registration No. 38,297
Attorney of Record
2040 Main Street
Irvine, CA 92614